

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VERISIGN, INC.,)
Plaintiff,)
v.) Civil Action No. 1:15-cv-01028-LO-IDD
CENTRALNIC LIMITED,)
XYZ.COM LLC,)
and-)
DANIEL NEGARI,)
Defendants.)

DEFENDANTS XYZ.COM LLC AND DANIEL NEGARI'S MOTION TO DISMISS

Defendants XYZ.com LLC and Daniel Negari, by their counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, move this Court to dismiss Plaintiff Verisign, Inc.'s First Amended Complaint for the reasons set forth in the supporting Memorandum filed herewith.

Respectfully submitted,

/s/ Joanna L. Faust
Joanna L. Faust, VSB No. 72930
CAMERON MCEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
(703) 460-9349 (Direct)
(703) 273-8898 (Main)
(703) 273-8897 (Facsimile)
jfaust@cameronmcevoy.com
*Counsel for Defendants CentralNic Limited,
XYZ.COM LLC and Daniel Negari*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 20th, 2015, I filed the foregoing using the Court's CM/ECF system, which sent a true and accurate copy to:

Timothy B. Hyland, Esquire
Elizabeth A. Dwyer, Esquire
Hyland Law PLLC
1818 Library Street, Suite 500
Reston, Virginia 20190
Counsel for Plaintiff

/s/ Joanna L. Faust
Joanna L. Faust, VSB No. 72930
CAMERON MCEVOY, PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, Virginia 22030
(703) 460-9349 (Direct)
(703) 273-8898 (Main)
(703) 273-8897 (Facsimile)
ecameron@cameronmcevoy.com
jfaust@cameronmcevoy.com
*Counsel for Defendants CentralNic Limited,
XYZ.COM LLC and Daniel Negari*